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February 6, 2006

**VIA ELECTRONIC DELIVERY**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: EB-06-TC-060  
EB Docket No. 06-36  
Certification of CPNI Filing (February 6, 2006)**

Dear Secretary Dortch,

Pursuant to the Commission's Public Notice released on January 30, 2006, attached is the annual certification of The Pager & Phone Company in compliance with section 64.2009(e) of the Commission's rules, 47 C.F.R. §64.2009(e).

If you have any questions, please do not hesitate to contact the undersigned at (202) 408-6345.

Sincerely,



Kathleen Greenan Ramsey

**THE PAGER & PHONE COMPANY INC.  
ANNUAL SECTION 64.2009(e) CERTIFICATION**

I, Dale R. Schmick, a duly authorized officer and CEO of The Pager & Phone Company ("Pager Co." or the "Company"), hereby certify on behalf of Pager Co., that I have personal knowledge that the Company has operating procedures as described in the attached statement that to the best of my knowledge, information and belief are adequate to ensure compliance with the rules of the Federal Communications Commission, codified at 47 C.F.R. Subpart U, implementing Section 222 of the Communications Act of 1934, as amended.



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Dale R. Schmick - CEO  
The Pager & Phone Company  
February 6, 2006

**STATEMENT REGARDING OPERATING PROCEDURES  
IMPLEMENTING 47 C.F.R. SUBPART U  
GOVERNING USE OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)**

The following statement explains the internal procedures of The Pager & Phone Company ("Pager Co." or the "Company") to ensure that it is in compliance with the Commission's CPNI rules.

Pager Co. was started in 1995 to offer low cost communications services to people who could not otherwise afford to stay in touch. The Company currently offers prepaid wireless, paging, long distance and residential telephone service to customers in Missouri, <http://www.thepagerco.com/contact.htm> Oklahoma and Kansas through the Company's 17 retail locations.

Because the Company's services are offered on a pre-paid basis only, the Pager Co. does not come in contact with the same level of customer data as non-prepaid service providers. However, some key aspects of Pager Co.'s security policies and procedures with respect to any customer data it does come in contact with are:

- *Need to Know* – Pager Co. only allows employee access to customer information on a need-to-know basis.
- *Physical Security* – Pager Co. maintains physically secure facilities for the storage of all customer data.
- *Computer Security* – Pager Co. maintains customer data within computer infrastructure accessible by authorized personnel only. Customer pay their bills in person through company owned retail locations, or online via "PayPal", a reputable and secure payment processing application.

Pager Co.'s operating procedures are designed to ensure consumer information is protected in compliance with section 222 of the Communications Act. Pager Co. uses CPNI internally for the purpose of providing a customer with the requested service, and does not sell any customer records. Pager Co. also uses CPNI internally for the following actions:

- (1) to bill and collect for services rendered;
- (2) to provision installation, maintenance, and repair services; and
- (3) marketing service offerings among the categories of service to which the customer already subscribes from Pager Co.

Pager Co.'s normal operating procedures require that CPNI be used only for the purposes identified above. Customer approval is not required for these uses of CPNI as they are specifically permitted under the statute or by Commission rule. However, the security of customer information is of paramount

importance to Pager Co., and the Company intends to continue to develop and implement operating procedures for the protection of customer data.